

EXHIBIT A

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

SUNBELT ENVIRONMENTAL)	
SERVICES, INC.,)	
)	
Plaintiff,)	
)	Case No.: 6:19-cv-03127-LMC
v.)	
)	
)	
SERAPHIM SOLAR USA)	
MANUFACTURING, INC.,)	
STEVE C. OSTRENGA,)	
JARROD R. ERWIN, and)	
RYAN C. ERWIN,)	
)	
Defendants.)	

**DECLARATION OF DEFENDANT STEVE C. OSTRENGA
IN SUPPORT OF MOTION TO DISMISS**

I, Steve C. Ostrenga, declare:

1. I am an individual over the age of 18, and I make this declaration based upon my own personal knowledge, and if called upon to testify, could and would testify competently as stated herein. I make this declaration in support of my Motion to Dismiss.
2. On or about March 3, 2019, a copy of the State Court Summons and Petition in this lawsuit was left at my home in Milwaukee, Wisconsin.
3. I reside in Milwaukee, Wisconsin.
4. I am not now nor have I ever been a citizen or resident of the State of Missouri.
5. At all times relevant to the Petition, I was an employee of Seraphim Solar USA Manufacturing, Inc. ("Seraphim"). I worked at Seraphim from September 2016 until October 2018.

6. I am not, nor have I ever been, a principal of Seraphim. While working for Seraphim, my only contacts with the State of Missouri were in my capacity as an authorized agent and employee of Seraphim, solely by way of telephone, email, and written correspondence with Plaintiff, all of which occurred while I was outside of the State of Missouri.

7. I do not now nor have I ever employed any individual in the State of Missouri.

8. I do not now nor have I ever owned or leased any real estate in the State of Missouri.

9. I do not now nor have I ever maintained a mailing address, post office box, telephone, bank account or safe deposit box in the State of Missouri.

10. I do not now nor have I ever owned, possessed, or controlled any asset or thing of value present within the State of Missouri.

11. I do not now nor have I ever owned an interest in any trust administered in the State of Missouri.

12. I am not now nor have I ever performed any duties as a director or officer of a corporation organized under the laws of Missouri or having its principal place of business in the State of Missouri.

13. I do not now nor have I ever directed or managed the day-to-day operations of any business in the State of Missouri.

14. I have never been a party to a contract made within the State of Missouri, intended to be performed within the State of Missouri, or having any relation to Missouri of which I am aware.

15. I do not now nor have I ever paid taxes in the State of Missouri.

16. I do not now nor have I ever held a license of any kind issued by the State of Missouri.

17. At all times relevant to the allegations in Plaintiff's Petition, I was acting as an authorized agent and employee of Seraphim.


18. During my communications with Plaintiff, I discussed Plaintiff's concerns regarding Seraphim's ability to perform its contractual obligations to Plaintiff, and I believed every statement I made to be true at the time I made it.

19. At all times during my communications with Plaintiff, I did not know or have reason to believe Seraphim might not be able to perform its contract with Plaintiff, which was to be performed outside of Missouri.

20. I did not execute the contract between Plaintiff and Seraphim.

21. I did not retain any personal benefit from my communications with Plaintiff.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Steve C. Ostrenga
4/29/2019

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